



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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July 22, 2020

**BY ECF**

Honorable Peggy Kuo  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Danielle Rosenfeld, et. ano. v. Tara Lenich, et al., 18 CV 6720 (NGG) (PK)**

Your Honor:

I am an attorney in the office of James E. Johnson, Corporation Counsel of the City of New York, counsel for defendants City of New York, Kings County District Attorney Eric Gonzalez, Lu-Shawn Thompson as administrator of the Estate of Kenneth Thompson, Mark Feldman, William Schaefer, Brian Donohue, William Power, Michael Dowling, Joseph Piraino and Robert Kenavan (collectively, "City defendants") in the above-referenced matters. I write jointly with plaintiffs' counsel, Samuel Shapiro, Esq., to respectfully request an extension from July 24, 2020 to August 7, 2020 for the parties to submit a proposed settlement in the above-referenced matter and to move for preliminary approval from the District Court. The settlement agreement, notice and claim forms are reaching their final form, and the parties are completing scripts for telephone operators to utilize. As a result, plaintiffs will begin drafting a motion for preliminary approval and a related proposed order which defendants will need to review. For these reasons the parties respectfully request a two week extension of time in which to submit an agreement for preliminary approval.

The parties thank the Court for its consideration of this application.

Respectfully submitted,

/s/

Joshua J. Lax  
Senior Counsel  
Special Federal Litigation Division

cc: All counsel (**By ECF**)